## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

Regina Boston,	)
Plaintiff,	)
	) Case No. 3:12-cv-680-GCM
	) Honorable Judge Graham C. Mullen
Leading Edge Recovery Solutions, LLC,	)
Defendant.	)
	,

## **DECLARATION OF DANIEL BEAM**

- I, Daniel Beam, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct:
  - 1. I am over 18 years of age, and am of sound mind.
  - 2. I am familiar with the facts set forth in this Declaration through personal knowledge and/or review of corporate records.
  - 3. I am competent to testify to the matters stated herein.
  - 4. I am familiar with the Complaint filed by Plaintiff Regina Boston ("Plaintiff") and the allegations contained therein.
  - 5. I am the Director of Regulatory Compliance for Leading Edge Recovery Solutions, LLC ("LERS").
  - 6. LERS is a limited liability company with a business office located in Chicago, Illinois.
  - 7. LERS is a debt collection company and its business includes, but is not limited to, collecting on unpaid, outstanding consumer account balances.
  - 8. On June 4, 2010, Capital One Services, LLC, engaged LERS to collect on a Capital One Bank (USA), N.A. ("Capital One") credit card debt owed by Plaintiff.
  - 9. On June 4, 2010, after LERS was engaged to collect Plaintiff's Capital One credit card account, LERS requested and reviewed Plaintiff's credit information from TransUnion.

- 10. LERS inquired into Plaintiff's credit information from TransUnion as part of its reasonable efforts to collect Plaintiff's outstanding Capital One account.
- 11. At the time LERS made the credit inquiry from TransUnion, LERS had no reason to believe that the Capital One credit account was not owed by Plaintiff.
- 12. The inquiry into Plaintiff's credit information from TransUnion was for no other purpose than to assist LERS with the collection of Plaintiff's Capital One account.
- 13. LERS attempted to collect on the account, and the account was subsequently closed in LERS' system.

Under penalties as provided by law, the undersigned certifies that the statements set forth in this instrument are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7 day of November, 2012.